

EXHIBIT 1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF ROY E. MILLER

I, ROY MILLER, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.

2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration.

3. The facts set forth below are true of my personal knowledge.

4. I am an attorney at law duly admitted to practice before this Court and courts of the State of California.

5. I am an attorney with the law firm of Hansen & Miller, attorneys of record for thousands of victims of the fires started by PG&E in 2017 (the twenty fires generally referred to as the “North Bay”), 2018 (“Camp Fire”) and 2019 (“Kincade Fire”).

6. I make this Declaration in support of the motion to allow late filing of proofs of claim (“Motion”) on behalf of Gene Hawley and Joan Hawley (collectively “Movants”), whom lost their respective homes in the Tubbs Fire. Gene Hawley and Joan Hawley are jointly represented by Hansen & Miller and Watts Guerra LLP.

7. These clients did not have a claim filed before the December 31, 2019 claims bar date due to excusable neglect and should be allowed to file a proof of claim after the bar date.

8. Gene and Joan Hawley lost their home in the Tubbs Fire. They came to a townhall meeting at my law firm’s Santa Rosa office in September 2019 and took paper work home to sign up for a claim. The Hawley’s believe they returned the fee agreement and other paper work for signing up as a client before the December 31, 2019 deadline. Thus the Hawley’s believe they accomplished everything necessary to have a claim filed prior to the deadline. However, no one at Hansen & Miller recalls their paperwork ever being provided. Hansen & Miller sent its clients regular update letters and twice searched the entire office before the December 31, 2019 deadline

1 to ensure all clients had their claims filed. On April 23, 2020, the Hawley's contacted Hansen &
2 Miller to inquire about their claim. Hansen & Miller, searched their offices, their databases, and
3 all other avenues to locate the Hawley's fee agreement. In the end, it was determined that the
4 Hawley's believed they had acted timely in returning their contract and supporting documentation
5 to our offices but in three different contact instances, Hansen & Miller could not locate any
6 documentation for the Hawleys.
7

8 9. On May 26, 2020, Watts Guerra LLP filed claim numbers UEBNK27402 and
9 D@A@F27402 on behalf of the Movants ("Subject Proofs of Claims"). True and correct copies
10 of the Subject Proofs of Claims are attached collectively hereto as Exhibit A.
11

12 I declare under penalty of perjury under the laws of the State of California that the
13 forgoing is true and correct and executed this 26th day of May 2020.
14

15 /s/ Roy Miller
16 Roy Miller
17
18
19
20
21
22
23
24
25
26
27
28